

NICHOLAS A. TRUTANICH  
United States Attorney  
Nevada Bar Number 13644  
SIMON F. KUNG  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Tel: 702.388.6265 / Fax: 702.388.6418  
simon.kung@usdoj.gov  
*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

FERNANDO RAMIREZ, JR.,

Defendant.

2:19-cr-00300-JCM-EJY

**Stipulation to Continue Sentencing  
Hearing**

IT IS HEREBY STIPULATED AND AGREED by and between, Nicholas A. Trutanich, United States Attorney, District of Nevada, Simon F. Kung, Assistant United States Attorney, representing the United States of America, and Chris T. Rasmussen, Esq., representing Defendant Fernando Ramirez Jr., that the sentencing hearing in the above captioned case, which is currently scheduled for February 17, 2021 at 10:30 AM., be continued and reset to a date and time convenient to the Court, but no sooner than sixty (60) days.

The Stipulation is being entered for the following reasons:

1. Based on the public health emergency brought about by the COVID-2019 pandemic, and the required social-distancing measures as recognized in the Court's Temporary General Order 2020-05 Extended, the parties agree to continue the currently

1 scheduled sentencing hearing from February 17, 2021 at 10:30 AM., to a date and  
2 time convenient to the Court, but no sooner than thirty (60) days.

3 2. The previously assigned Assistant United States Attorney has left the office and this  
4 case was recently assigned to the undersigned Assistant United States Attorney. The  
5 additional time is necessary to allow new counsel for the Government sufficient time  
6 within which to be able to effectively prepare for the sentencing hearing.

7 3. This continuance allows counsel for the defendant additional time to prepare for the  
8 hearing.

9 4. This continuance is not sought for purposes of delay, but to account for the necessary  
10 social-distancing in light of the COVID-2019 public health emergency.

11 5. The defendant is out of custody and does not object to the continuance.

12  
13 DATED this 8th day of February, 2021.

14  
15 NICHOLAS A. TRUTANICH  
United States Attorney

16 /s/ Simon F. Kung  
SIMON F. KUNG  
17 Assistant United States Attorney

CHRIS T. RASMUSSEN  
RASMUSSEN LAW P.C.

18 /s/ Chris T. Rasmussen  
CHRIS T. RASMUSSEN, ESQ.  
19 Counsel for Defendant  
20  
21  
22  
23  
24

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

FERNANDO RAMIREZ, JR.,

Defendant.

2:19-cr-00300-JCM-EJY

**Findings and Order on Stipulation**


Based on the pending Stipulation between the defense and the government, and good cause appearing therefore, the Court hereby finds that:

1. To account for the necessary social-distancing in light of the COVID-19 public health emergency, the sentencing hearing in this case should be continued.
2. The parties agree to this continuance.
3. The previously assigned Assistant United States Attorney has left the office and this case was recently assigned to the undersigned Assistant United States Attorney. The additional time is necessary to allow new counsel for the Government sufficient time within which to be able to effectively prepare for the sentencing hearing.
4. This continuance allows counsel for the defendant additional time to prepare for the hearing.
5. The defendant is out of custody and does not object to the continuance.
6. This continuance is not sought for purposes of delay.

1           THEREFORE, IT IS HEREBY ORDERED that the sentencing hearing in the  
2 above-captioned matter currently scheduled for February 17, 2021 at 10:30 AM., be vacated  
3 and continued to a date and time convenient to this court, that is

4                     May 5                     , 2021                     , at the hour of 10:00 a.m.

5                     DATED February 10, 2021.

6  
7  
8  
9                                       
10                                    HONORABLE JAMES C. MAHAN  
11                                    United States District Court Judge  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24